

**FILED**

**MAR - 4 2015**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAWN DONNELL ROBINSON,  
BRANDY NICOLE TATSCH,  
SADE MAGDALENA RAMOS,  
LUIS MANUEL TORRIJOS, and  
HUMBERTO BOUCHE,

Defendants.

Cause No.

**4:15CR0100 HEA/DDN**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury but including July, 2014 through February 6, 2015, in St. Louis City, within the Eastern District of Missouri and elsewhere, the defendants,

**SHAWN DONNELL ROBINSON,  
BRANDY NICOLE TATSCH,  
SADE MAGDALENA RAMOS,  
LUIS MANUEL TORRIJOS, and  
HUMBERTO BOUCHE,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with AGATHA HEIBERT-PETERS, DAVID GUENTHER, and with other persons known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a

Schedule I Controlled Substance drug, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846; and

Quantity of Heroin Involved in the Conspiracy

1. With respect to all defendants, the amount of heroin involved in the conspiracy attributable to each defendant as a result of their own conduct, and the conduct of others reasonably foreseeable to them is one kilogram or more, punishable under Title 21, United States Code, Section 841(b)(1)(A ).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) & 846, as set forth in Count 1, the defendants shall forfeit to the United States of America any property, constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violations and any property used or intended to be used, in any manner or part to commit or to facilitate the commission of such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of said violations.

3. Specific property subject to forfeiture includes, but is not limited to, the following:

- (a) One 2007 Jeep Cherokee SRT-8, VIN: 1J8HR783X7C624888;
- (b) Approximately \$301,200 U.S. Currency;

- (c) Approximately \$713.00 U.S. Currency;
- (d) Approximately \$3,360.00 U.S. Currency;
- (e) Real Property located at 4521 Blair Avenue, St. Louis, MO 63107, and  
more particularly described as:  
  
C.B. 2445 Blair Ave., 27FT X 125 FT, Bissell Place Addn, Lot S-11,  
Parcel Number 2445-00-0170-0, with all appurtenances and attachments  
thereon; and
- (f) Real Property located at 9859 Ventura Drive St. Louis, MO 63136, and  
more particularly described as:  
  
Highview Acres, Lot Pts 2 & 3, (S PT2 & N PT 3), Parcel Number:  
11G-3-3-007-0, with all appurtenances and attachments thereon.

4. If any of the property described above, as a result of any act or omission  
of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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JOHN T DAVIS, #40915  
Assistant United States Attorney